

Exhibit D

Budget and Staffing Plan

Budget and Staffing Plan

**(For Matter Categories for the Period Beginning on November 1, 2022 and
Ending on February 28, 2023)**

Budget

Matter Number	Project Category Description	Hours Budgeted	Total Compensation Budgeted
3	Adversary Proceeding & Contested Matters	2,525 - 3,283	\$3,606,150 - \$4,445,000
4	Automatic Stay Matters	220 - 286	\$195,947 - \$255,000
5	Business Operations	740 - 963	\$710,315 - \$925,000
6	Case Administration	1,350 - 1,755	\$1,261,881 - \$1,640,000
7	Cash Management and DIP Financing	20 - 26	\$21,223 - \$30,000
8	Customer and Vendor Communications	335 - 436	\$296,926 - \$390,000
9	Claims Administration and Objections	465 - 605	\$426,434 - \$550,000
10	Official Committee Matters and Meetings	175 - 228	\$158,052 - \$205,000
11	Use, Sale, and Disposition of Property	6,020 - 7,826	\$4,790,957 - \$6,525,000
12	Corp., Governance, & Securities Matters	610 - 793	\$545,533 - \$710,000
13	Employee Matters	910 - 1,184	\$740,988 - \$1,025,000
14	Executory Contracts and Unexpired Leases	145 - 189	\$145,948 - \$190,000
15	SOFAs and Schedules	75 - 98	\$73,849 - \$100,000
16	Hearings	255 - 332	\$263,879 - \$340,000
17	Insurance and Surety Matters	20 - 26	\$16,348 - \$20,000
18	Disclosure Statement, Plan, Confirmation	915 - 1,190	\$1,900,198 - \$2,170,000
19	International Issues	40 - 52	\$38,448 - \$50,000
20	K&E Retention Matters	1,275 - 1,658	\$467,390 - \$815,000
21	Non-K&E Retention Matters	460 - 599	\$449,244 - \$585,000
22	Tax Matters	195 - 254	\$191,800 - \$250,000
23	Non-Working Travel	80 - 104	\$80,183 - \$100,000
24	U.S. Trustee Communications & Reporting	105 - 137	\$108,290 - \$140,000
25	Expenses	355 - 462	\$363,466 - \$470,000
26	Special Committee Matters	2,360 - 3,068	\$2,421,976 - \$3,150,000
27	Stone Litigation	0	\$0
28	Prime Trust Litigation	0	\$0
29	Equities First Holdings Litigation	0	\$0
30	Stake Hound Litigation	0	\$0
38	Blockchain Access UK Litigation	0	\$0
41	Tether Limited Litigation	0	\$0
42	Core Scientific Litigation	1,175 - 1,528	\$883,607 - \$1,390,000
43	Examiner Matters	1,045 - 1,359	1,522,178 - \$1,980,000
44	GK8	1,270 - 1,651	\$874,447 - \$1,435,000
45	Frishberg Litigation	50 - 66	\$59,515 - \$80,000
46	Core Scientific, Chapter 11 Filing	0	\$0

Matter Number	Project Category Description	Hours Budgeted	Total Compensation Budgeted
47	Tiffany Fong Litigation	0	\$0
48	K&E Fee Matters	0	\$0
49	Non-K&E Fee Matters	0	\$0
50	Government and Regulatory Investigations	0	\$0
51	Appeals	0	\$0
TOTAL		10,730 - 30,148	\$22,615,172 - \$29,965,000

Staffing Plan

Category of Timekeeper	Number of Timekeepers Expected to Work on the Matter Categories During the Budget Period	Average Hourly Rate¹
Partner	15	\$1,566
Associate	25	\$912
Legal Assistant	7	\$395
Total	37	\$1,073

¹ The Average Hourly Rate is a weighted average based on the individual hourly rate of, and projected number of hours worked by, each timekeeper over the course of the chapter 11 cases.